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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE DANIELS FAMILY 2001 REVOCABLE
TRUST, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

LAS VEGAS SANDS CORP., DR. MIRIAM
ADELSON, in her capacity as Special
Administrator of the estate of SHELDON
G. ADELSON, PATRICK DUMONT, and
ROBERT G. GOLDSTEIN,

Defendants.

Case No.: 2:20-cv-01958-CDS-EJY

**STIPULATION TO EXTEND
DEADLINE FOR PARTIES TO
SUBMIT DISCOVERY PLAN AND
SCHEDULING ORDER**

(FIRST REQUEST)

Defendants Las Vegas Sands Corp., Dr. Miriam Adelson, in her capacity as Special Administrator of the Estate of Sheldon G. Adelson, Patrick Dumont, and Robert G. Goldstein (collectively, "Defendants"), and Lead Plaintiffs Carl S. Ciaccio and Donald M. DeSalvo (collectively, "Plaintiffs," and together with Defendants, "the Parties") stipulate that the deadline

1 for the Parties to submit a discovery plan and scheduling order is extended until January 12, 2024.

2 The Parties further state as follows:

3 1. On August 8, 2023, the Court issued an Order granting in part and denying in part
4 Defendants' motion to dismiss Plaintiffs' Second Amended Complaint. ECF No. 108.

5 2. On August 22, 2023, Defendants filed a Motion for Partial Reconsideration, or for
6 an Order Certifying an Interlocutory Appeal, of the Court's August 8 Order, ECF No. 109
7 ("Defendants' Motion for Reconsideration"), and for a Motion for Stay Pending Adjudication of
8 Defendants' Motion for Reconsideration, ECF No. 110. Those motions were fully briefed on
9 September 12, 2023. *See* ECF Nos. 117 & 118.

10 3. On September 29, 2023, Plaintiffs filed a Motion for a Rule 16 Pretrial Conference
11 and Order Directing the Parties to Meet and Confer on Scheduling and Discovery. ECF No. 121
12 ("Plaintiffs' Motion on Scheduling and Discovery").

13 4. On October 23, 2023, Magistrate Judge Youchah granted Plaintiffs' Motion on
14 Scheduling and Discovery in part, and ordered the parties to submit a discovery plan and scheduling
15 order in accordance with her comments on the record on October 23 (the "Discovery Plan") by
16 December 18, 2023. ECF Nos. 131 & 132. Plaintiffs and Defendants met and conferred on
17 December 4, 2023 regarding the drafting of the Discovery Plan.

18 5. On November 13, 2023, Judge Silva entered a Minute Order setting a hearing on
19 Defendants' Motion for Reconsideration for December 11, 2023, ECF No. 134, and that hearing
20 was later rescheduled to December 12, 2023 due to a conflict in the Court's schedule, ECF No.
21 139.

22 6. Due to a scheduling conflict for Plaintiffs on the December 12 hearing date, Judge
23 Silva rescheduled the hearing to December 19, 2023. ECF No. 140.

24 7. In light of the upcoming hearing before Judge Silva and the change in scheduling,
25 the Parties have agreed to extend the deadline for submitting the Discovery Plan until after the
26 hearing on Defendants' Motion for Reconsideration. The hearing and its potential outcome may
27 inform the preparation and content of the Discovery Plan, including whether one need be submitted.
28

8. In addition, in light of the upcoming hearing, holidays, and associated travel, the Parties have agreed to an extension to January 12, 2024.

9. Accordingly, the undersigned counsel, subject to approval of the Court, have agreed and stipulated that the Parties' deadline to file the Discovery Plan is extended until January 12, 2024.

For the foregoing reasons, the Parties respectfully request that the Court enter an order extending the Parties' deadline to file the Discovery Plan until January 12, 2024.

Dated: December 14, 2023

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ORDER

IT IS SO ORDERED. DATED:

December 14, 2023



ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE